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JOSEPH A. TRAVERS

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
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Clerk of the Superior Court  
By Regina Chanez, Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF SAN DIEGO**

JOSEPH A. TRAVERS,

Plaintiffs,

vs.

CHRIS REYNOLDS, and Does 1 through 25,  
Inclusive,

Defendants.

Case No.: 37-2019-00047644-CU-DF-CTL

**VERIFIED FIRST AMENDED  
COMPLAINT FOR:**

- (1) NEGLIGENCE;  
(2) DEFAMATION (SLANDER);  
(3) DEFAMATION (LIBEL)  
(4) INVASION OF PRIVACY- FALSE  
LIGHT;  
(5) INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS; AND  
(6) INJUNCTIVE RELIEF

Plaintiff, JOSEPH A. TRAVERS ("Plaintiff") complains and alleges:

**GENERAL ALLEGATIONS**

1. Plaintiff is, and at all relevant times was, a resident of the State of California, County of San Diego.
2. Defendant Chris Reynolds ("Reynolds") was and is at all time referenced herein a resident of Sonoma California and doing business in the County of San Diego, California.
3. Plaintiff has learned the true name of defendant designated as Doe 1 and substitutes the true name Dotti Laster ("Laster") for the fictitious name.
4. Plaintiff believes and is informed that Defendant Laster works and resides in San Antonio, Texas.
5. The Plaintiff is unaware of the true names and capacities, whether individual,

1 corporate, associate or otherwise, of defendants Does 2 to 25, inclusive, and therefore sue these  
2 defendants by fictitious names. The Plaintiff is informed and believe and on that basis alleges  
3 that these Does, and each of them, are in some manner responsible and liable for the acts and/or  
4 damages alleged in this verified first amended complaint ("Complaint"). The Plaintiff will seek  
5 leave of court to amend this Complaint to show the Doe defendants' true names and capacities  
6 when they have been ascertained.

7 6. The Plaintiff is informed and believe and on that basis allege that at all relevant  
8 times, except where pled otherwise, defendants, and each of them, were acting as the agents,  
9 servants and employees of each of the other defendants, and each of them, and were acting  
10 within the full course and scope of their agency and employment with the full knowledge,  
11 consent, permission and ratification, either express or implied, of each of the other cross-  
12 defendants in performing the acts acknowledged in this complaint.

13 7. Plaintiff is the co-founder and executive director of the non-profit organization  
14 Saved in America, Inc. ("SIA"). SIA was founded to help stop child trafficking in the United  
15 States. SIA assists parents and/or guardians in locating abducted and runaway children at no  
16 costs. SIA's mission: "CHILD SAVED NOT SOLD." Once the child is located, SIA reports the  
17 location to law enforcement and thereafter assists law enforcement in recovering the child.  
18 Thereafter, SIA assists the parent and/or guardian in placing the child in an rehabilitation facility  
19 and thereafter may assist providing prosecutors with evidence to prosecute the predator(s) and  
20 may assist in the filing of a civil action against the predators. SIA also provides private  
21 investigators to rehabilitation facilities to protect the children therein from leaving the facility  
22 and being taken back into sex trafficking by their exploiters/pimps.

23 8. On or around December 6, 2018, Defendant Reynolds made the following  
24 statements to SIA's agent Dan Shomo ("Shomo"):

- 25 (a) Joseph Travers was scam artist.
- 26 (b) Joseph Travers was the head of a cover up with fellow Cali Members.
- 27 (c) Joseph Travers was notorious for using people to get what he wants and  
28 when he is done with them, he finds ways to discredit them or get rid of  
29 them.
- 30 (d) Joseph Travers is well known for being a scam artist.
- 31 (e) Strategic Opps Security & Investigative Services ("SOSIS") was a  
32 coverup because it was the same business as SIA and was operating

1 through Joseph Travers' church.

2 9. Further, on that same day, Defendant Reynolds directed Shomo to ask to see all  
3 financial records of SIA and to "follow the money."

4 10. On December 19, 2018, SIA's agent Toshiro Carrington ("Carrington") made a  
5 telephone to Defendant Reynolds regarding a communication Defendant Reynolds had with a  
6 former SIA team member. Defendant Reynolds did not answer his phone so Carrington left  
7 Defendant Reynolds a voice mail message.

8 11. At about 3:08 pm that same day, Defendant Reynolds returned Carrington's  
9 phone call. Carrington introduced himself to Defendant Reynolds as team lead for the former  
10 Special Warfare operators of SIA. At first Defendant Reynolds was very confrontational and told  
11 Carrington that Carrington maybe trying to pull something over on him and that he did not know  
12 who Carrington was and would not speak with Carrington.

13 12. Carrington explained that Carrington needed to know if Joseph Travers was doing  
14 anything illegal and or unethical with SIA because as team-lead, Carrington needed to protect the  
15 reputations of the other team members, who are retired Special War veterans.

16 13. Defendant Reynolds then stated Defendant Reynolds knew that Travers and  
17 Carrington were partners in a business and that Defendant Reynolds was unwilling to talk to  
18 Carrington anymore. Carrington explained that the SIA team had just lost a team member due to  
19 a conversation that team member had recently had with Defendant Reynolds. Initially, Defendant  
20 Reynolds acted like he did not know what Carrington was referring to. Carrington informed  
21 Defendant Reynolds that the former team member Carrington was referring to was Dan Shomo.  
22 At that point in the conversation, Defendant Reynolds made the following statements to  
23 Carrington about Travers and SIA:

- 24 (a) SIA, SOSIS and National Christian Information Center's ("NCIC") tax  
25 accounting were all businesses operating under Mr. Travers' Church.  
26 (b) SIA has not rescued as many girls as advertised and there is no proof of  
27 rescue and that Mr. Travers is misleading the public in order to get  
28 donations for Mr. Travers' non- profit.  
29 (c) Mr. Travers has run many scams in the past.  
30 (d) Mr. Travers covered up an incident concerning Dana Griffith with CALI  
31 when Mr. Travers was president of CALI. Mr. Reynolds stated that Mr.  
32 Travers was unethical, arrogant and unremorseful for Mr. Travers' actions

1 as president of CALI.

2 (e) Defendant Reynolds claimed that SOSIS is an illegitimate business and  
3 none of its members would not receive their private investigation hours for  
4 the QM status.

5 (f) Defendant Reynolds compared Travers to President Trump that one day  
6 they will pay for their crimes.

7 14. On or about September 13, 2019, Defendant Reynolds published a 73 page report  
8 on his website <https://cdrpi.com/> entitled “Confidential Investigation Report Re: Joseph A.  
9 Travers” (“Reynolds’ Report” or “RR”).

10 15. Reynolds’ Report states that Travers: (a) “made intentional misrepresentations  
11 about Mr. Travers alleged charitable work, successful saving of children and his misuse of a  
12 charitable, non-profit church for the operation of private enterprises, including a private  
13 investigation business” (RR p. 5); (b) “has a pattern of providing false and misleading  
14 information to the public about his qualifications, background and financial positions” (RR p. 5);  
15 (c) committed the crime of perjury in bankruptcy actions to avoid paying thousands of dollars he  
16 owed to friends and colleagues (RR p. 5); (d) misrepresented his POST certification  
17 qualifications and he misrepresented his experience as a police officer (RR p. 6); (e) worked for  
18 three agencies and failed to complete their probationary periods to obtain permanent employment  
19 (RR p. 6); (f) misrepresented to the public the true number of successful rescues by reporting  
20 “false figures” (RR p. 6); (g) misrepresented to the public that Saved in America does not charge  
21 for rescuing girls because SIA was paid by Casa De Amparo to provide weekend security  
22 services around the perimeter of Casa De Amparo to discourage sex traffickers and pimps from  
23 exploiting the girls (RR p. 6); (h) intent was to obtain money and assets from the public, local  
24 charitable groups and the San Diego government by conflating his rescue figures and presenting  
25 a misleading picture of his success rate”(RR p. 6); (i) continues to allow the media to publish  
26 information, including statistics that he has a 100% success rate. Those statements are false, yet  
27 Mr. Travers posted those news articles or videos on his Saved in America website, creating a  
28 false and misleading impression about the program. Those false and misleading impressions  
29 cause the public to donate money to the program (RR p. 6); (j) constantly in litigation over his  
30 financial affairs (RR p. 7); (k) falsely represented to the public that he held the lofty position of  
31 “Professor Emeritus” (RR p. 7); (l) employment at a vocational college was terminated based on  
32 his misrepresentations about the true value of the business and its assets (RR p. 7); (m) misused

1 the Bankruptcy court system by repeatedly making false statements under penalty of perjury (RR  
2 p. 7); (n) had a practice of failing to disclose his true financial condition, including the  
3 misrepresentation of his income (RR p. 7); (o) Mr. Travers' abuse of the system allowed him to  
4 discharge almost \$2,000,000 of debt he compiled between 2003 and 2012 (RR pp. 7-8); (p)  
5 conduct as an officer of two trade associations was further evidence of his incompetence and  
6 misconduct (RR p. 8); (q) covered up embezzlement of CALI funds by his friend, breaching his  
7 fiduciary duties to the association (RR p. 8); ( r) as the treasurer of a non-profit organization,  
8 failed to ever examine the books or prepare any financial oversight (RR p. 8); (s) duped local  
9 philanthropic members of the San Diego community into giving him significant money for his  
10 programs (RR p. 8); (t) and Saved in America, through misrepresentations and embellished  
11 figures, were able to receive grants from the Neighborhood Reinvestment Program for almost  
12 \$300,000 (RR p. 8); (u) the electronic products purchased with grant money were being used by  
13 Mr. Travers for-profit businesses (RR p. 8); (v) has multiple business entities and he claims to  
14 supervise over twenty-five people who were given private investigator licenses because of their  
15 affiliation with Mr. Travers, not because they had special skills that would allow for licensing.  
16 (RR p. 8); (w) "partners" or "vice president (s)" had no relationship to their experience. If the  
17 individuals made applications for a separate BSIS Private Investigator license, they would have  
18 been rejected by BSIS for a lack of qualified experience and training (RR p. 8); (x) took  
19 advantage of loopholes within the Department of Consumer Affairs to give Private Investigation  
20 and Private Patrol licenses to people with little or no experience in the field. This action  
21 represents a threat to the public as these people have no training as investigators or guards (RR p.  
22 9); (y) developed a licensing scheme to allow Mr. Travers to misrepresent that his Saved in  
23 America crew had special experience because they were all licensed investigators. The  
24 unsuspecting public did not know these "investigators" had no experience that would allow them  
25 to be licensed under the normal licensing processes in California (RR p. 9); (z) misled the  
26 "investigators" working under him to believe their hours working for him would count toward  
27 the qualifying hours needed to receive a real private investigator license (RR p. 9); (aa) had no  
28 reservations about giving a Private Investigator license to Mr. William Norwood, the former  
29 police chief of Lake Arthur, New Mexico, even after Mr. Norwood was exposed as the leader of  
30 an unethical and controversial plan to give concealed weapons permits to private citizens under  
31 the guise of appointing them as "reserve police officers" in Lake Arthur, a town of under 500  
32 residents. (RR p. 9); (bb) encouraged his staff to acquire concealed weapons permits through this

questionable and inappropriate program, even though Mr. Travers was aware of the laws in California that forbid the action (RR p. 9); (cc) staff by Mr. Norwood were part of a quid pro quo exchange for a California private investigator license from Mr. Travers. (RR p. 9); (dd) circumvented the Department of Consumer Affairs LLC regulations by making his crew “partners” in the LLC/LP, making them eligible for licenses (RR p. 10); (ee) history of criminal conduct involving domestic violence and stalking was not always properly disclosed during Mr. Travers’ licensing with the Department of Consumer Affairs (RR p 10); (ff) Mr. Travers failure to disclose was consistent with his pattern of misrepresenting himself to the public for his own purposes (RR pp. 10-11); (gg) failed to disclose to BSIS on multiple occasions his criminal background. Even when Mr. Travers made a disclosure, he misrepresented the convictions and the sentencing by the court (RR p. 11); (hh) ownership of the Universal Schools & Colleges of Health and Human Services, Inc. dba US Colleges, was completely misrepresented to the Bankruptcy courts. Mr. Travers falsely claimed in the Bankruptcy court that he only received \$25,000 from the sale of the business, when the sales agreement he signed stated the sale was for \$250,000, of which he received \$125,000 (RR p. 11); and (ii) claimed he was virtually without funds during his bankruptcy proceedings, he was successful in buying three homes. One home was purchased for \$600,000, less than two months after he emerged from bankruptcy. The court was advised Mr. Travers earned less than \$7,000 for the entire year. As soon as the bankruptcy ended, Mr. Travers bought the \$600,000 home (RR p. 11); (jj) directed his NCIC/SIA staff to arrive at the Casa De Amparo facility carrying weapons and on one occasion, children who left the facility and were directed at gunpoint to return by NCIC/SIA staff (RR p. 35);

16. On or about September 18, 2019, Defendant Reynolds provided a copy of his report to Dotti Laster (“Laster”). Thereafter, Laster republished the Defendant Reynolds report to Kelly Litvak.

### **FIRST CAUSE OF ACTION**

**(For Negligence Against Defendant Reynolds and Defendant Laster**

**And Does 2-25, Inclusive)**

17. Plaintiff realleges and incorporates by reference paragraphs 1 through 16 above, inclusive.

18. Defendant Reynolds and Defendant Laster owed the Plaintiff a duty to act reasonably in his conversations with the public about Plaintiff.

19. Defendant Reynolds acted negligently in making the following statements to

Shomo:

(a) Travers was scam artist; (b) Travers was the head of a cover up with fellow CALI Members; (c) Travers was notorious for using people to get what he wants and when he is done with them, he finds ways to discredit them or get rid of them; (d) Travers is well known for being a scam artist; (e) SOSIS was a coverup because it was the same business as SIA and was operating through Travers' church.

20. Defendant Reynolds acted negligently in making the following statements to Carrington:

- (a) SIA, SOSIS and NCIC'S tax accounting were all businesses operating under Travers' Church;
- (b) SIA has not rescued as many girls as advertised and there is no proof of rescue and that Travers is misleading the public in order to get donations for Travers' non- profit;
- (c) Travers has run many scams in the past;
- (d) Travers covered up an incident concerning Dana Griffith with CALI when Travers was president of CALI, Defendant Reynolds stated that Travers was unethical, arrogant and unremorseful for Travers' actions as president of CALI; (e) Defendant Reynolds claimed that SOSIS is an illegitimate business and none of its members would not receive their private investigation hours for the QM status;
- (f) Defendant Reynolds compared Travers to President Trump that one day they will pay for their crimes.

21. Defendant Reynolds acted negligently in making and publishing the following statements on the internet in the Reynolds' Report: Reynolds' Report states that Travers: (a) "made intentional misrepresentations about Mr. Travers alleged charitable work, successful saving of children and his misuse of a charitable, non-profit church for the operation of private enterprises, including a private investigation business" (RR p. 5); (b) "has a pattern of providing false and misleading information to the public about his qualifications, background and financial positions" (RR p. 5); (c) committed the crime of perjury in bankruptcy actions to avoid paying thousands of dollars he owed to friends and colleagues (RR p. 5); (d) misrepresented his POST certification qualifications and he misrepresented his experience as a police officer (RR p. 6); (e) worked for three agencies and failed to complete their probationary periods to obtain permanent

1 employment (RR p. 6); (f) misrepresented to the public the true number of successful rescues by  
2 reporting “false figures” (RR p. 6); (g) misrepresented to the public that Saved in America does  
3 not charge for rescuing girls because SIA was paid by Casa De Amparo to provide weekend  
4 security services around the perimeter of Casa De Amparo to discourage sex traffickers and  
5 pimps from exploiting the girls (RR p. 6); (h) intent was to obtain money and assets from the  
6 public, local charitable groups and the San Diego government by conflating his rescue figures  
7 and presenting a misleading picture of his success rate”(RR p. 6); (i) continues to allow the  
8 media to publish information, including statistics that he has a 100% success rate. Those  
9 statements are false, yet Mr. Travers posted those news articles or videos on his Saved in  
10 America website, creating a false and misleading impression about the program. Those false and  
11 misleading impressions cause the public to donate money to the program (RR p. 6); (j) constantly  
12 in litigation over his financial affairs (RR p. 7); (k) falsely represented to the public that he held  
13 the lofty position of “Professor Emeritus” (RR p. 7); (l) employment at a vocational college was  
14 terminated based on his misrepresentations about the true value of the business and its assets (RR  
15 p. 7); (m) misused the Bankruptcy court system by repeatedly making false statements under  
16 penalty of perjury (RR p. 7); (n) had a practice of failing to disclose his true financial condition,  
17 including the misrepresentation of his income (RR p. 7); (o) Mr. Travers’ abuse of the system  
18 allowed him to discharge almost \$2,000,000 of debt he compiled between 2003 and 2012 (RR  
19 pp. 7-8); (p) conduct as an officer of two trade associations was further evidence of his  
20 incompetence and misconduct (RR p. 8); (q) covered up embezzlement of CALI funds by his  
21 friend, breaching his fiduciary duties to the association (RR p. 8); ( r) as the treasurer of a non-  
22 profit organization, failed to ever examine the books or prepare any financial oversight (RR p.  
23 8); (s) duped local philanthropic members of the San Diego community into giving him  
24 significant money for his programs (RR p. 8); (t) and Saved in America, through  
25 misrepresentations and embellished figures, were able to receive grants from the Neighborhood  
26 Reinvestment Program for almost \$300,000 (RR p. 8); (u) the electronic products purchased with  
27 grant money were being used by Mr. Travers for-profit businesses (RR p. 8); (v) has multiple  
28 business entities and he claims to supervise over twenty-five people who were given private  
29 investigator licenses because of their affiliation with Mr. Travers, not because they had special  
30 skills that would allow for licensing. (RR p. 8); (w) “partners” or “vice president (s)” had no  
31 relationship to their experience. If the individuals made applications for a separate BSIS Private  
32 Investigator license, they would have been rejected by BSIS for a lack of qualified experience



1 and training (RR p. 8); (x) took advantage of loopholes within the Department of Consumer  
2 Affairs to give Private Investigation and Private Patrol licenses to people with little or no  
3 experience in the field. This action represents a threat to the public as these people have no  
4 training as investigators or guards (RR p. 9); (y) developed a licensing scheme to allow Mr.  
5 Travers to misrepresent that his Saved in America crew had special experience because they  
6 were all licensed investigators. The unsuspecting public did not know these “investigators” had  
7 no experience that would allow them to be licensed under the normal licensing processes in  
8 California (RR p. 9); (z) misled the “investigators” working under him to believe their hours  
9 working for him would count toward the qualifying hours needed to receive a real private  
10 investigator license (RR p. 9); (aa) had no reservations about giving a Private Investigator license  
11 to Mr. William Norwood, the former police chief of Lake Arthur, New Mexico, even after Mr.  
12 Norwood was exposed as the leader of an unethical and controversial plan to give concealed  
13 weapons permits to private citizens under the guise of appointing them as “reserve police  
14 officers” in Lake Arthur, a town of under 500 residents. (RR p. 9); (bb) encouraged his staff to  
15 acquire concealed weapons permits through this questionable and inappropriate program, even  
16 though Mr. Travers was aware of the laws in California that forbid the action (RR p. 9); (cc) staff  
17 by Mr. Norwood were part of a quid pro quo exchange for a California private investigator  
18 license from Mr. Travers. (RR p. 9); (dd) circumvented the Department of Consumer Affairs  
19 LLC regulations by making his crew “partners” in the LLC/LP, making them eligible for licenses  
20 (RR p. 10); (ee) history of criminal conduct involving domestic violence and stalking was not  
21 always properly disclosed during Mr. Travers’ licensing with the Department of Consumer  
22 Affairs (RR p 10); (ff) Mr. Travers failure to disclose was consistent with his pattern of  
23 misrepresenting himself to the public for his own purposes (RR pp. 10-11); (gg) failed to  
24 disclose to BSIS on multiple occasions his criminal background. Even when Mr. Travers made a  
25 disclosure, he misrepresented the convictions and the sentencing by the court (RR p. 11); (hh)  
26 ownership of the Universal Schools & Colleges of Health and Human Services, Inc. dba US  
27 Colleges, was completely misrepresented to the Bankruptcy courts. Mr. Travers falsely claimed  
28 in the Bankruptcy court that he only received \$25,000 from the sale of the business, when the  
29 sales agreement he signed stated the sale was for \$250,000, of which he received \$125,000 (RR  
30 p. 11); (ii) claimed he was virtually without funds during his bankruptcy proceedings, he was  
31 successful in buying three homes. One home was purchased for \$600,000, less than two months  
32 after he emerged from bankruptcy. The court was advised Mr. Travers earned less than \$7,000 for

1 the entire year. As soon as the bankruptcy ended, Mr. Travers bought the \$600,000 home (RR p.  
2 11); and (jj) directed his NCIC/SIA staff to arrive at the Casa De Amparo facility carrying  
3 weapons and on one occasion, children who left the facility and were directed at gunpoint to  
4 return by NCIC/SIA staff (RR p. 35).

5 22. Laster acted negligently in republishing Reynolds' Report to Kelly Litvak.

6 23. At all relevant times herein, Plaintiff was a member of the public, SIA, SOSIS  
7 and NCIC in good standing. As a member of the public, SIA, SOSIS and NCIC, Defendant  
8 Reynolds and Defendant Laster owed Plaintiff a duty to act reasonably.

9 24. As a direct and proximate cause of Defendant Remolds and Defendant Laster's  
10 negligence as alleged above, the Plaintiff has suffered loss of his personal and professional  
11 reputation causing Plaintiff to suffer general damages according to proof at time of trial.

## 12 **SECOND CAUSE OF ACTION**

### 13 **(For Defamation (Slander) Against Defendant Reynolds**

#### 14 **And Does 2-25, Inclusive)**

15 25. Plaintiff realleges and incorporates by reference paragraphs 1 through 24 above,  
16 inclusive.

17 26. On or about December 6, 2018, Defendant Reynolds made the following  
18 statements to Shomo: (a) Travers was scam artist; (b) Travers was the head of a cover up with  
19 fellow CALI Members; (c) Travers was notorious for using people to get what he wants and  
20 when he is done with them, he finds ways to discredit them or get rid of them; (d) Travers is well  
21 known for being a scam artist; (e) SOSIS was a coverup because it was the same business as SIA  
22 and was operating through Travers' church.

23 27. On December 19, 2018, Defendant Reynolds made the following statements to  
24 Carrington:

25 (a) SIA, SOSIS and NCIC'S tax accounting were all businesses operating under  
26 Travers' Church; (b) SIA has not rescued as many girls as advertised and there is  
27 no proof of rescue and that Travers is misleading the public in order to get  
28 donations for Travers' non- profit; (c) Travers has run many scams in the past; (d)  
29 Travers covered up an incident concerning Dana Griffith with CALI when  
30 Travers was president of CALI, Defendant Reynolds stated that Travers was  
31 unethical, arrogant and unremorseful for Travers' actions as president of CALI;  
32 (e) Defendant Reynolds claimed that SOSIS is an illegitimate business and none of

its members would not receive their private investigation hours for the QM status;  
(f) Defendant Reynolds compared Travers to President Trump that one day they  
will pay for their crimes.

28. Defendant Reynolds' statements to Shomo and Carrington were false.

29. Defendant Reynolds' statements to Shomo and Carrington are slanderous on its  
face because they state that Travers was committing the crime of defrauding people as a "scam  
artist" for his personal gain. In fact, Travers has never defrauded anyone. Defendant Reynolds'  
statement to Shomo and Carrington were understood by Shomo and Carrington to be true such  
that Shomo stopped working with Travers. Accordingly, Defendant Reynolds' statements to  
Shomo and Carrington defamed Travers' good character.

30. As a proximate result of the above-described slander, Travers has suffered loss of  
its reputation, has been exposed to ongoing contempt and ridicule, and suffered loss of reputation  
and standing in the investigative community across the United States as whole which has caused  
Travers humiliation, embarrassment, and loss of prospective business advantages and  
relationships, all to his general damage in an amount according to proof at trial.

31. The defamatory statements made by Defendant Reynolds was done with malice in  
that the statements were made either with knowledge of their falsity or in reckless disregard for  
the truth in that the statements were blatantly untrue as Travers denies ever defrauding anyone at  
anytime.

32. In creating the above publicity, Defendant Reynolds acted with hatred and ill will  
towards Travers within the meaning of Section 48a(4)(c) and (d) of the Civil Code, in that the  
statements were blatantly untrue as Travers denied ever participating in any of the described  
misconduct or any misconduct whatsoever. Travers therefore seeks an award of punitive  
damages against Defendant Reynolds.

### **THIRD CAUSE OF ACTION**

#### **(For Defamation (Libel) Against Defendant Reynolds and Defendant Laster And Does 2-25, Inclusive)**

33. Plaintiffs reallege and incorporate by reference paragraphs 1 through 32 above,  
inclusive.

34. At all times herein mentioned, Plaintiff Travers was, and now is, a private  
investigator duly licensed by the State of California and engaged in business throughout the State  
of California for over 30 years and at all times has enjoyed a good reputation both generally and

1 in her occupation.

2 35. Saved in America is a non-profit organization operating in the City and County of  
3 San Diego, State of California and at all times has enjoyed a good reputation.

4 36. On or about September 14, 2019, Defendant Reynolds, a private investigator  
5 licensed in the State of California, published a 73 page written report on his website  
6 <https://cdrpi.com/> entitled “Confidential Investigation Report Re: Joseph A. Travers.”

7 37. The two negative reviews described above are libelous because the language  
8 contains defamatory meanings, as opposed to innocent meanings. The negative post of  
9 Defendant Reynolds Report contains false and unprivileged statements about Plaintiff that  
10 exposes him to hatred, contempt, ridicule or obloquy, or that causes Plaintiff to be shunned or  
11 avoided, or which has a tendency of injuring SIA and all other organizations and business  
12 associations that Plaintiff has formed.

13 38. The publication of the Reynolds Report was made about and concerning Plaintiff  
14 and was so understood by those who read the publication.

15 39. On or about September 18, 2019, Defendant Reynolds provided a copy of his  
16 report to Defendant Laster. Thereafter, Defendant Laster republished the Defendant Reynolds  
17 report to Kelly Litvak.

18 40. The following statements from the September 13, 2019 posting of the Defendant  
19 Reynolds Report are false, unprivileged and libelous as they apply to Plaintiff:

- 20 (a) “made intentional misrepresentations about Mr. Travers alleged charitable  
21 work, successful saving of children and his misuse of a charitable, non-  
22 profit church for the operation of private enterprises, including a private  
23 investigation business” (RR p. 5);
- 24 (b) “has a pattern of providing false and misleading information to the public  
25 about his qualifications, background and financial positions” (RR p. 5);
- 26 (c) committed the crime of perjury in bankruptcy actions to avoid paying  
27 thousands of dollars he owed to friends and colleagues (RR p. 5);
- 28 (d) misrepresented his POST certification qualifications and he  
29 misrepresented his experience as a police officer (RR p. 6);
- 30 (e) worked for three agencies and failed to complete their probationary  
31 periods to obtain permanent employment (RR p. 6);
- 32 (f) misrepresented to the public the true number of successful rescues by

- reporting “false figures” (RR p. 6);
- (g) misrepresented to the public that Saved in America does not charge for rescuing girls because SIA was paid by Casa De Amparo to provide weekend security services around the perimeter of Casa De Amparo to discourage sex traffickers and pimps from exploiting the girls (RR p. 6);
- (h) intent was to obtain money and assets from the public, local charitable groups and the San Diego government by conflating his rescue figures and presenting a misleading picture of his success rate”(RR p. 6);
- (i) continues to allow the media to publish information, including statistics that he has a 100% success rate. Those statements are false, yet Mr. Travers posted those news articles or videos on his Saved in America website, creating a false and misleading impression about the program. Those false and misleading impressions cause the public to donate money to the program (RR p. 6);
- (j) constantly in litigation over his financial affairs (RR p. 7);
- (k) falsely represented to the public that he held the lofty position of “Professor Emeritus” (RR p. 7);
- (l) employment at a vocational college was terminated based on his misrepresentations about the true value of the business and its assets (RR p. 7);
- (m) misused the Bankruptcy court system by repeatedly making false statements under penalty of perjury (RR p. 7);
- (n) had a practice of failing to disclose his true financial condition, including the misrepresentation of his income (RR p. 7);
- (o) Mr. Travers’ abuse of the system allowed him to discharge almost \$2,000,000 of debt he compiled between 2003 and 2012 (RR pp. 7-8);
- (p) conduct as an officer of two trade associations was further evidence of his incompetence and misconduct (RR p. 8);
- (q) covered up embezzlement of CALI funds by his friend, breaching his fiduciary duties to the association (RR p. 8);
- (r) as the treasurer of a non-profit organization, failed to ever examine the books or prepare any financial oversight (RR p. 8);

- (s) duped local philanthropic members of the San Diego community into giving him significant money for his programs (RR p. 8);
- (t) and Saved in America, through misrepresentations and embellished figures, were able to receive grants from the Neighborhood Reinvestment Program for almost \$300,000 (RR p. 8); (u) the electronic products purchased with grant money were being used by Mr. Travers for-profit businesses (RR p. 8);
- (v) has multiple business entities and he claims to supervise over twenty-five people who were given private investigator licenses because of their affiliation with Mr. Travers, not because they had special skills that would allow for licensing. (RR p. 8);
- (w) “partners” or “vice president (s)” had no relationship to their experience. If the individuals made applications for a separate BSIS Private Investigator license, they would have been rejected by BSIS for a lack of qualified experience and training (RR p. 8);
- (x) took advantage of loopholes within the Department of Consumer Affairs to give Private Investigation and Private Patrol licenses to people with little or no experience in the field. This action represents a threat to the public as these people have no training as investigators or guards (RR p. 9);
- (y) developed a licensing scheme to allow Mr. Travers to misrepresent that his Saved in America crew had special experience because they were all licensed investigators. The unsuspecting public did not know these “investigators” had no experience that would allow them to be licensed under the normal licensing processes in California (RR p. 9);
- (z) misled the “investigators” working under him to believe their hours working for him would count toward the qualifying hours needed to receive a real private investigator license (RR p. 9);
- (aa) had no reservations about giving a Private Investigator license to Mr. William Norwood, the former police chief of Lake Arthur, New Mexico, even after Mr. Norwood was exposed as the leader of an unethical and controversial plan to give concealed weapons permits to private citizens

- under the guise of appointing them as “reserve police officers” in Lake Arthur, a town of under 500 residents. (RR p. 9);
- (bb) encouraged his staff to acquire concealed weapons permits through this questionable and inappropriate program, even though Mr. Travers was aware of the laws in California that forbid the action (RR p. 9);
- (cc) staff by Mr. Norwood were part of a quid pro quo exchange for a California private investigator license from Mr. Travers. (RR p. 9);
- (dd) circumvented the Department of Consumer Affairs LLC regulations by making his crew “partners” in the LLC/LP, making them eligible for licenses (RR p. 10);
- (ee) history of criminal conduct involving domestic violence and stalking was not always properly disclosed during Mr. Travers’ licensing with the Department of Consumer Affairs (RR p 10);
- (ff) Mr. Travers failure to disclose was consistent with his pattern of misrepresenting himself to the public for his own purposes (RR pp. 10-11);
- (gg) failed to disclose to BSIS on multiple occasions his criminal background. Even when Mr. Travers made a disclosure, he misrepresented the convictions and the sentencing by the court (RR p. 11);
- (hh) ownership of the Universal Schools & Colleges of Health and Human Services, Inc. dba US Colleges, was completely misrepresented to the Bankruptcy courts. Mr. Travers falsely claimed in the Bankruptcy court that he only received \$25,000 from the sale of the business, when the sales agreement he signed stated the sale was for \$250,000, of which he received \$125,000 (RR p. 11);
- (ii) claimed he was virtually without funds during his bankruptcy proceedings, he was successful in buying three homes. One home was purchased for \$600,000, less than two months after he emerged from bankruptcy. The court was advised Mr. Travers earned less than \$7,000 for the entire year. As soon as the bankruptcy ended, Mr. Travers bought the \$600,000 home (RR p. 11); and
- (jj) directed his NCIC/SIA staff to arrive at the Casa De Amparo facility

1 carrying weapons and on one occasion, children who left the facility and  
2 were directed at gunpoint to return by NCIC/SIA staff (RR p. 35).

3 41. Each statement described in paragraph 39, above, is libelous on its face. Each  
4 statement clearly exposes Plaintiff to hatred, contempt, ridicule, and obloquy because:

- 5 (a) the statement made in 39(a) above, “made intentional misrepresentations  
6 about his alleged charitable work, successful saving of children and his  
7 misuse of a charitable, non-profit church for the operation of private  
8 enterprises, including a private investigation business” blatantly states that  
9 Plaintiff made fraudulent misrepresentations about his charitable work in  
10 saving children and that Plaintiff misused his charitable non-profit church  
11 to operate private enterprises.
- 12 (b) the statement made in 39(b) above “has a pattern of providing false and  
13 misleading information to the public about his qualifications, background  
14 and financial positions” blatantly states that Plaintiff has a pattern of  
15 defrauding the public by giving false and misleading information  
16 concerning his qualifications, background and financial positions;
- 17 (c) the statement made in 39(c) above, that Plaintiff committed the crime of  
18 perjury in bankruptcy actions to avoid paying thousands of dollars he  
19 owed to friends and colleagues, blatantly states that Plaintiff has  
20 committed the crime of perjury in court proceedings for the purpose of  
21 avoiding his financial responsibilities to his friends and colleagues.
- 22 (d) the statement made in 39(d), that Plaintiff misrepresented his POST  
23 certification qualifications and he misrepresented his experience as a  
24 police officer, blatantly states that Plaintiff lied about his qualifications  
25 and experience as a police officer.
- 26 (e) the statement made in 39(e) that Plaintiff worked for three agencies and  
27 failed to complete their probationary periods to obtain permanent  
28 employment. blatantly states that Plaintiff lied about his permanent  
29 employment in law enforcement agencies.
- 30 (f) the statement made in 39(f) that Plaintiff misrepresented to the public the  
31 true number of successful rescues by reporting “false figures,” blatantly  
32 states the Plaintiff lied to the public about the number of children that SIA



1 had rescued.

2 (g) the statement made in 39(g) that Plaintiff misrepresented to the public that  
3 Saved in America does not charge for rescuing girls because SIA was paid  
4 by Casa De Amparo to provide weekend security services around the  
5 perimeter of Casa De Amparo to discourage sex traffickers and pimps  
6 from exploiting the girls, blatantly states that Plaintiff defrauded the public  
7 by lying to them that SIA's services for locating children was free.

8 (h) the statement made in 39(h) that Plaintiff's intent was to obtain money and  
9 assets from the public, local charitable groups and the San Diego  
10 government by conflating his rescue figures and presenting a misleading  
11 picture of his success rate, blatantly states that Plaintiff intended to obtain  
12 money from the public, local charities and the San Diego government by  
13 defrauding them by lying to them about his success rate in rescuing  
14 children.

15 (i) the statement made in 39(i) that Plaintiff continues to allow the media to  
16 publish information, including statistics that he has a 100% success rate.  
17 Those statements are false, yet Mr. Travers posted those news articles or  
18 videos on his Saved in America website, creating a false and misleading  
19 impression about the program. Those false and misleading impressions  
20 cause the public to donate money to the program, blatantly states that  
21 Plaintiff is using the media coverage to defraud the public to obtain their  
22 donations by giving false information about his success rate in rescuing  
23 children.

24 (j) the statement made in 39(j) that Plaintiff is constantly in litigation over his  
25 financial affairs, blatantly states that Plaintiff is litigious for his own  
26 financial affairs.

27 (k) the statement made in 39(k) that Plaintiff falsely represented to the public  
28 that he held the lofty position of "Professor Emeritus," blatantly states that  
29 Plaintiff lied to the public about his position of Professor Emeritus.

30 (l) the statement made in 39(l) that Plaintiff's employment at a vocational  
31 college was terminated based on his misrepresentations about the true  
32 value of the business and its assets, blatantly states that Plaintiff was fired

1 because he made fraudulent statements about the true value of the business  
2 and its assets.

3 (m) the statement made in 39(m) that Plaintiff misused the Bankruptcy court  
4 system by repeatedly making false statements under penalty of perjury,  
5 blatantly states that Plaintiff committed the crime of perjury in court  
6 proceedings.

7 (n) the statement made in 39(n) that Plaintiff had a practice of failing to  
8 disclose his true financial condition, including the misrepresentation of his  
9 income, blatantly states that Plaintiff lies about his financial condition and  
10 income.

11 (o) the statement made in 39(o) that Plaintiff has abused of the bankruptcy  
12 system so that he was allowed to discharge almost \$2,000,000 of debt he  
13 compiled between 2003 and 2012 blatantly states that Plaintiff wrongfully  
14 used the bankruptcy system to his own financial gain.

15 (p) the statement made in 39(p) that Plaintiff's conduct as an officer of two  
16 trade associations was further evidence of his incompetence and  
17 misconduct blatantly states that Plaintiff participated in misconduct and  
18 that Plaintiff is incompetent;

19 (q) the statement made in 39(q) that Plaintiff covered up embezzlement of  
20 CALI funds by his friend, breaching his fiduciary duties to the association  
21 blatantly states that Plaintiff committed the crime of covering up an  
22 embezzlement for a friend and that Plaintiff breached his fiduciary duty.

23 (r) the statement made in 39(r) that Plaintiff as the treasurer of a non-profit  
24 organization, failed to ever examine the books or prepare any financial  
25 oversight blatantly states that Plaintiff was incompetent as in his position  
26 as treasurer;

27 (s) the statement made in 39(s) that Plaintiff duped local philanthropic  
28 members of the San Diego community into giving him significant money  
29 for his programs, blatantly states that Plaintiff defrauded philanthropist in  
30 San Diego community;

31 (t) the statement made in 39(t) that Plaintiff and Saved in America, through  
32 misrepresentations and embellished figures, were able to receive grants

1 from the Neighborhood Reinvestment Program for almost \$300,000,  
2 blatantly states that Plaintiff defrauded Neighborhood Reinvestment  
3 Programs for \$300,000;

4 (u) the statement made in 39(u) that the electronic products that Plaintiff  
5 purchased with grant money were being used by Plaintiff for his for-profit  
6 businesses, blatantly states that Plaintiff defrauded the grant givers and  
7 misappropriated the electronic products for his own profit;

8 (v) the statement made in 39(v) that Plaintiff has multiple business entities  
9 and he claims to supervise over twenty-five people who were given  
10 private investigator licenses because of their affiliation with Mr. Travers,  
11 not because they had special skills that would allow for licensing, blatantly  
12 states that Plaintiff is defrauding the licensing agencies to give licenses to  
13 unskilled people;

14 (w) the statement made in 39(w) that Plaintiff's "partners" or "vice president  
15 (s)" had no relationship to their experience. If the individuals made  
16 applications for a separate BSIS Private Investigator license, they would  
17 have been rejected by BSIS for a lack of qualified experience and training,  
18 blatantly states that Plaintiff is defrauding the licensing agencies to obtain  
19 licenses to unqualified, untrained people;

20 (x) the statement made in 39(x) that Plaintiff took advantage of loopholes  
21 within the Department of Consumer Affairs to give Private Investigation  
22 and Private Patrol licenses to people with little or no experience in the  
23 field. This action represents a threat to the public as these people have no  
24 training as investigators or guards, blatantly states that Plaintiff is  
25 defrauding the licensing agencies to obtain licenses to unqualified,  
26 untrained people and these untrained people have put the public at risk;

27 (y) the statement made in 39(y) that Plaintiff developed a licensing scheme to  
28 allow Mr. Travers to misrepresent that his Saved in America crew had  
29 special experience because they were all licensed investigators. The  
30 unsuspecting public did not know these "investigators" had no experience  
31 that would allow them to be licensed under the normal licensing processes  
32 in California, blatantly states that Plaintiff is defrauding the licensing

1 agencies to obtain licenses to unqualified, untrained people and these  
2 untrained people have put the public at risk;

3 (z) the statement made in 39(y) that Plaintiff misled the “investigators”  
4 working under him to believe their hours working for him would count  
5 toward the qualifying hours needed to receive a real private investigator  
6 license, blatantly states that Plaintiff defrauded his “investigators” into  
7 believing that if they worked for him that would receive their private  
8 investigator’s license;

9 (aa) the statement made in 39(aa) that Plaintiff had no reservations about  
10 giving a Private Investigator license to Mr. William Norwood, the former  
11 police chief of Lake Arthur, New Mexico, even after Mr. Norwood was  
12 exposed as the leader of an unethical and controversial plan to give  
13 concealed weapons permits to private citizens under the guise of  
14 appointing them as “reserve police officers” in Lake Arthur, a town of  
15 under 500 residents, blatantly states that Plaintiff violated the law in  
16 giving William Norwood a private investigator license despite the fact that  
17 Norwood was involved in an unlawful scheme;

18 (bb) the statement made in 39(bb) that Plaintiff encouraged his staff to acquire  
19 concealed weapons permits through William Norwood’s questionable and  
20 inappropriate program, even though Plaintiff was aware of the laws in  
21 California that forbid the action, blatantly states that Plaintiff has engaged  
22 in criminal activities with William Norwood;

23 (cc) the statement made in 39(cc) that Plaintiff’s staff by William Norwood  
24 were part of a quid pro quo exchange for a California private investigator  
25 license from Plaintiff, blatantly states that Plaintiff has engaged in  
26 criminal activities with William Norwood ;

27 (dd) the statement made in 39(dd) that Plaintiff circumvented the Department  
28 of Consumer Affairs LLC regulations by making his crew “partners” in  
29 the LLC/LP, making them eligible for licenses, blatantly states that  
30 Plaintiff defrauded the Department of Consumer Affairs LLC;

31 (ee) the statement made in 39(ee) that Plaintiff history of criminal conduct  
32 involving domestic violence and stalking was not always properly

disclosed during Plaintiff's licensing with the Department of Consumer Affairs, blatantly states that Plaintiff has a criminal background and defrauded the Department of Consumer Affairs;

- (ff) the statement made in 39(bb) that Plaintiff 's failure to disclose his criminal background was consistent with his pattern of misrepresenting himself to the public for his own purposes, blatantly states that Plaintiff has a criminal background and defrauded the public;
- (gg) the statement made in 39(gg) that Plaintiff failed to disclose to BSIS on multiple occasions his criminal background. Even when Mr. Travers made a disclosure, he misrepresented the convictions and the sentencing by the court, blatantly states that Plaintiff has a criminal background and defrauded the BSIS;
- (hh) the statement made in 39(hh) that Plaintiff 's ownership of the Universal Schools & Colleges of Health and Human Services, Inc. dba US Colleges, was completely misrepresented to the Bankruptcy courts. Mr. Travers falsely claimed in the Bankruptcy court that he only received \$25,000 from the sale of the business, when the sales agreement he signed stated the sale was for \$250,000, of which he received \$125,000, blatantly states that Plaintiff defrauded the Bankruptcy court;
- (ii) the statement made in 39(ii) that Plaintiff claimed he was virtually without funds during his bankruptcy proceedings, he was successful in buying three homes. One home was purchased for \$600,000, less than two months after he emerged from bankruptcy. The court was advised Mr. Travers earned less than \$7,000 for the entire year. As soon as the bankruptcy ended, Mr. Travers bought the \$600,000 home, blatantly states that Plaintiff defrauded the Bankruptcy court; and
- (jj) the statement made in 39(jj) that Plaintiff directed his NCIC/SIA staff to arrive at the Casa De Amparo facility carrying weapons and on one occasion, children who left the facility and were directed at gunpoint to return by NCIC/SIA staff, blatantly states that Plaintiff directed and his staff complied, in holding children at gunpoint to return to the Casa De Amparo facility, thereby putting the children that they were protecting in

1 mortal danger.

2 42. These statements contained in Reynolds' Report that he posted on his website  
3 were seen and read by hundreds if not thousands of people in the general public, prospective  
4 supporters and associations, law enforcement departments that work with Plaintiff, as well as by  
5 professional colleagues, who reside in and around the San Diego, and were no doubt seen and  
6 read by many persons outside of California with whom Plaintiff works.

7 43. The negative posts were known by Defendant Reynolds to be false at the time he  
8 made them, or Defendant Reynolds acted in reckless disregard of the truth when he created and  
9 published the Reynolds' Report on the internet, with knowledge that the posts would be viewed  
10 by persons identified in paragraph 41.

11 44. As a proximate result of the above-described publication, Plaintiff has suffered  
12 loss of reputation, shame, mortification, and hurt feelings all to his general damages.

13 45. As a further proximate result of the above-described publication, Plaintiff has  
14 suffered the following special damages: injury to Plaintiff's non-profit organization, business and  
15 profession and professional reputation, all to his injury.

16 46. The above described publications were published by Defendant Reynolds, and  
17 republished by Laster with malice, oppression and fraud in that:

18 a. Defendant Reynolds and Defendant Laster knew and understood before  
19 that before the publication, that Plaintiff lawfully and ethically performed  
20 all his duties as the CEO of SIA, as well as any and all other non-profit  
21 organizations, associations, companies and corporation with which he is  
22 affiliated.

23 b. Defendant Reynolds and Defendant Laster knew that the Reynolds'  
24 Report was based on false information and yet knowingly published the  
25 false statements that Plaintiff engaged in the fraudulent and criminal  
26 activities set forth in paragraph 39, subdivisions (a)-(jj) in order to, and  
27 with the intention of, destroying Plaintiff's reputation, and to cause  
28 Plaintiff to lose his ability to pursue his work with SIA in finding missing  
29 and/or runaway children, or to be shunned by society.

30 c. After Defendant Reynolds made the publications, Plaintiff in writing twice  
31 or more requested a retraction of all false and defamatory statements in  
32 said publication, advising defendant how and why said statements were

false, but Defendant Reynolds refused in writing to do so, and did so with the intent to cause further damage and harm.

47. Thus Plaintiff seeks an award of punitive damages to punish Defendant Reynolds and Defendant Laster for their malicious conduct, by way of example, and to deter similar conduct in the future.

#### **FOURTH CAUSE OF ACTION**

##### **(For Invasion of Privacy-False Light-Against Defendant Reynolds**

##### **And Does 2-25, Inclusive)**

48. Plaintiffs reallege and incorporate by reference paragraphs 1 through 47 above, inclusive.

49. On or about September 13, 2019, Defendant Reynolds, without Plaintiff's consent, invaded Plaintiff's right to privacy by publishing the Reynolds' Report about Plaintiff on the internet, which, inter alia, falsely stated that Plaintiff had defrauded the public, governmental agencies, courts and donors and that he had engaged in criminal conduct and had a criminal history.

50. The Reynolds' Report published by Defendant Reynolds created false publicity in the sense of a public disclosure to a large number of people in that it was published on the internet on Defendant Reynolds website.

51. The publicity created by Defendant Reynolds placed Plaintiff in a false light in the public eye in that the review intentionally contained false statements and inaccuracies which incorrectly portrayed Plaintiff as fraud and a criminal.

52. The publicity created by Defendant Reynolds was offensive and objectionable to Plaintiff and to a reasonable person of ordinary sensibilities in that it made Plaintiff the object of scorn and distrust.

53. The publicity created by Defendant Reynolds was done with malice in that it was made either with knowledge of its falsity or in reckless disregard of its truth in that:

- a. Defendant Reynolds knew and understood before that before the publication, that Plaintiff lawfully and ethically performed all his duties as the CEO of SIA, as well as any and all other non-profit organizations, associations, companies and corporation with which he is affiliated.
- b. Defendant Reynolds knew that the Reynolds' Report was based on false information and yet knowingly published the false statements that Plaintiff

engaged in the fraudulent and criminal activities set forth in paragraph 39, subdivisions (a)-(jj) in order to, and with the intention of, destroying Plaintiff's reputation, and to cause Plaintiff to lose his ability to pursue his work with SIA in finding missing and/or runaway children, or to be shunned by society.

c. After Defendant Reynolds made the publications, Plaintiff in writing twice or more requested a retraction of all false and defamatory statements in said publication, advising Defendant Reynolds how and why said statements were false, but Defendant Reynolds maliciously refused to do so with the intent to cause further damage to Plaintiff.

54. The above described publication was published by Defendant Reynolds with malice, oppression and fraud, and Plaintiff is entitled to punitive damages against Defendant Reynolds.

#### **FIFTH CAUSE OF ACTION**

#### **(For Intentional Infliction of Emotional Distress Against Defendant Reynolds And Does 2-25, Inclusive)**

55. Plaintiffs reallege and incorporate by reference paragraphs 1 through 54 above, inclusive.

56. Defendant Reynolds intentionally published on the internet disparaging and false statements about Plaintiff in the Reynolds' Report.

57. At the time of publication, Defendant Reynolds knew his publication contained false statements that would defame Plaintiff.

58. Defendant Reynolds' publication of false and disparaging statements was made intentionally and with malice with the intent to cause Plaintiff to suffer emotional distress and embarrassment.

59. Defendant Reynolds' publication and continued publication of known false statements with intention to cause harm to Plaintiff's reputation, businesses and inflict mental suffering amounts to extreme and outrageous conduct exceeding all bounds of decency usually tolerated in a civilized society.

60. As a direct and proximate result of Defendant Reynolds' publication of disparaging false statements about Plaintiff, Plaintiff has suffered severe emotional distress.

61. Defendant Reynolds' outrageous conduct was directed primarily at Plaintiff and



1 caused Plaintiff to suffer severe emotional distress.

2 62. Plaintiff suffered nervousness, grief, anxiety, worry, mortification, shock,  
3 humiliation and indignity as a result of Defendant Reynolds' outrageous conduct.

4 63. Defendant Reynolds was advised after his first slander and libelous statements  
5 were published that the statements were defamatory per se and were causing Plaintiffs harm.  
6 Plaintiff and/or his counsel of record have 2-3 times requested Defendant Reynolds cease and  
7 desist making slanders and libelous statements against Plaintiff.

8 64. Defendant Reynolds, after being advised of the harm of the false statements,  
9 refused in writing to remove o amend her publication.

10 65. Defendant Reynolds' failure to act upon Plaintiff's requests to cease and desist his  
11 false and malicious publication constitutes an omission to act that was made willfully while  
12 knowing that the failure to do so would likely cause Plaintiff extreme mental distress.  
13 Accordingly plaintiffs are entitled to punitive damages.

14 **SIXTH CAUSE OF ACTION**

15 **(For Injunctive Relief Against Defendant Reynolds**

16 **And Does 1-25, Inclusive)**

17 66. Plaintiffs reallege and incorporate by reference paragraphs 1 through 65 above,  
18 inclusive.

19 67. As a direct and proximate result of Defendant Reynolds' ongoing wrongful acts,  
20 Plaintiff has suffered and will continue to suffer substantial pecuniary losses and irreparable  
21 injury to his reputation and goodwill.

22 68. As such, Plaintiff has no adequate remedy at law to compensate them for the  
23 continuing injuries inflicted by Defendant Reynolds. Accordingly, Plaintiff is entitled to  
24 temporary, preliminary and permanent injunctive relief.

25  
26 WHEREFORE, Plaintiff prays judgment as follows:

27 **AS TO THE FIRST CAUSE OF ACTION**

28 1. For general damages;

29 **AS TO THE SECOND CAUSE OF ACTION**

30 2. For general damages;

31 3. For exemplary and punitive damages;

1 **AS TO THE THIRD CAUSE OF ACTION**

- 2 4. For general damages;  
3 5. For exemplary and punitive damages;

4 **AS TO THE FOURTH CAUSE OF ACTION**

- 5 6. For general damages;  
6 7. For exemplary and punitive damages;

7 **AS TO THE FIFTH CAUSE OF ACTION**

- 8 8. For general damages;  
9 9. For exemplary and punitive damages;

10 **AS TO THE SIXTH CAUSE OF ACTION**

- 11 10. For injunctive relief prohibiting Defendant Reynolds from continuing to defame  
12 Plaintiff as complained of herein, and requiring Defendant Reynolds to remove  
13 the Reynolds' Report and each and every other defamatory statement he has  
14 published on the internet or otherwise about Plaintiff.

15 **AS TO ALL CAUSES OF ACTION**

- 16 11. For costs of suit herein incurred;  
17 12. For reasonable attorneys' fees; and  
18 13. For such other and further relief as the court deems just and proper.

19  
20 Dated: October 6, 2019

**LAW OFFICES OF STEVEN GIAMMICHELE**

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22  
23 Steven Giammichele, Esq.

24 Attorney for Plaintiff, JOSEPH A. TRAVERS  
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct..


JOSEPH A. TRAVERS

1 **VERIFICATION**

2 I, Joseph A. Travers, am the Plaintiff in the above-entitled action. The matters stated in  
3 the foregoing document are true of my knowledge except as to those matters which are stated on  
4 information and belief, and as to those matters, I believe them to be true.  
5

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct..  
8

9 Dated: October 6, 2019

10   
11 JOSEPH A. TRAVERS  
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